

## **Exhibit C**

**David Rothstein**

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**From:** David Rothstein <drothstein@rothsteinlawfirm.com>  
**Sent:** Monday, June 01, 2015 10:26 PM  
**To:** kathy.helms@ogletreedeakins.com  
**Cc:** Kathryn Thomas (KThomas@gsblaw.net) (KThomas@gsblaw.net); fwilliams@gsblaw.net  
**Subject:** Irani--Supplemental Discovery Responses  
**Attachments:** iraniphrfpsuppresponses.pdf; iraniphinterrogsuppanswer.pdf

Dear Kathy. I am attaching unsigned copies of Plaintiff's Supplemental Discovery Responses as required by Judge West during our hearing last week. I was not able to return to the office tonight, so I will get the signed documents to you tomorrow, if that is acceptable. Thank you, Dave.

David E. Rothstein  
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(Also licensed in N.C.)  
Rothstein Law Firm, PA  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

Afraaz R. Irani, M.D.,	)	C/A No.: 3:14-cv-03577-CMC-KDW
	)	
Plaintiff,	)	
	)	<b>PLAINTIFF'S SUPPLEMENTAL RESPONSES</b>
vs.	)	<b>TO DEFENDANT PALMETTO HEALTH'S</b>
	)	<b>FIRST REQUESTS FOR PRODUCTION</b>
Palmetto Health; University of	)	
South Carolina School of Medicine;	)	
David E. Koon, Jr., M.D., in his	)	
individual capacity; and John J.	)	
Walsh, IV, M.D., in his individual	)	
capacity,	)	
	)	
Defendants.	)	

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Plaintiff, Afraaz R. Irani, M.D., by and through his undersigned counsel, hereby provides the following Supplemental Responses to Defendant Palmetto Health's First Requests for Production pursuant to Rule 34 of the Federal Rules of Civil Procedure, as ordered by Magistrate Judge West on May 26, 2015.

21. Provide copies of all documents that you believe demonstrate that a contract exists between Palmetto Health and the ACGME.

**RESPONSE:** Plaintiff does not have any documents that would be responsive to this request, other than documents he has received from Defendants.

**SUPPLEMENTAL RESPONSE:** Plaintiff's breach of contract claims against Defendants are based on the following documents: Resident Agreement of Appointment; PH Resident Handbook; Affiliation Agreement between Palmetto Health and USC School of Medicine; Program Letter of Agreement between Palmetto Health and University Specialty Clinics-Orthopaedics Department; and the USC Department of Orthopaedics Resident Manual. A number of these

documents specifically incorporate applicable ACGME standards and program requirements, including specific RRC requirements.

22. Provide copies of all documents that you believe demonstrate that Dr. Irani is an intended beneficiary or was ever an intended beneficiary of any contract between the ACGME and Palmetto Health providing all documentary evidence thereof.

**RESPONSE:** Plaintiff does not have any documents that would be responsive to this request, other than documents he has received from Defendants.

**SUPPLEMENTAL RESPONSE:** Plaintiff's breach of contract claims against Defendants are based on the following documents: Resident Agreement of Appointment; PH Resident Handbook; Affiliation Agreement between Palmetto Health and USC School of Medicine; Program Letter of Agreement between Palmetto Health and University Specialty Clinics—Orthopaedics Department; and the USC Department of Orthopaedics Resident Manual. A number of these documents specifically incorporate applicable ACGME standards and program requirements, including specific RRC requirements.

23. Provide all documents that demonstrate that Palmetto Health in any way prevented Dr. Irani from entering into any contract because of his race and provide a copy of the contract.

**RESPONSE:** Plaintiff does not have any documents that would be responsive to this request, other than documents he has received from Defendants.

**SUPPLEMENTAL RESPONSE:** Plaintiff's breach of contract claims against Defendants are based on the following documents: Resident Agreement of Appointment; PH Resident Handbook; Affiliation Agreement between Palmetto Health and USC School of Medicine; Program Letter of Agreement between Palmetto Health and University Specialty Clinics—Orthopaedics

Department; and the USC Department of Orthopaedics Resident Manual. A number of these documents specifically incorporate applicable ACGME standards and program requirements, including specific RRC requirements.

Respectfully submitted,

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Attorneys for Plaintiff, Afraaz R. Irani, M.D.

June \_\_\_\_\_, 2015

Greenville, SC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies the he served a copy of the foregoing **PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT PALMETTO HEALTH'S FIRST REQUESTS FOR PRODUCTION** upon counsel for Defendants by e-mail and by depositing a copy of the same in the United States mail, proper first-class postage pre-paid, this \_\_\_\_\_ day of June, 2015, addressed as follows:

Kathy Dudley Helms, Esq. ([Kathy.Helms@ogletreedeakins.com](mailto:Kathy.Helms@ogletreedeakins.com))  
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David E. Rothstein

Greenville, South Carolina.